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ILLINOIS COMMERCE COMMISSION

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Illinois Commerce Commission
On Its Own Motion

Investigation concerning Illinois Bell
Telephone Company's compliance with
Section 271 of the Telecommunications Act
of 1996.

01-0662

**REPLY BRIEF OF THE
COOK COUNTY STATE'S ATTORNEY'S OFFICE**

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August 28, 2002

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**REPLY BRIEF OF THE
COOK COUNTY STATE'S ATTORNEY'S OFFICE**

The Cook County State's Attorney's Office, *ex rel.* RICHARD A. DEVINE, State's Attorney of Cook County, hereby files this Reply Brief pursuant to the Section 200.800 of the Rules of Practice of the Illinois Commerce Commission (ICC or the Commission). 83 Ill. Admin. Code Section 200.800.

I. Introduction/Summary of Position

As Ameritech Illinois noted in its brief, "[t]his proceeding represents a significant step toward an important goal." Ameritech Illinois Brief at 1. If Ameritech Illinois is permitted to sell long distance services in Illinois, Illinois ratepayers would clearly benefit from the additional telecommunications options that would be available to them. The State's Attorney's Office supports policies that assist in promoting the development of an open and competitive local market. However, if we are to ensure that Illinois consumers obtain the benefits of a competitive market both for the short and long term, we also recognize the need to conduct a careful review

and analysis of the complex factors affecting competition. Those factors are reflected in the Federal Commerce Commission's (FCC) 14-point checklist.

In the prior briefs filed in connection with this docket, the Staff of the Illinois Commerce Commission (Staff) has provided a detailed discussion and analysis of checklist related issues. ICC Staff Initial Brief at 41-220. While Ameritech Illinois should be commended for its good faith efforts to resolve many of the issues raised by Staff, for Ameritech Illinois to bring itself into compliance with Section 271, additional progress must be made on several issues. Below we highlight some areas where deficiencies remain.

II. The Telecommunications Act of 1996 - The Competitive Checklist

Staff has detailed the remedial actions it contends Ameritech Illinois must take to receive a positive recommendation to the FCC.¹ While it is important that the Commission consider the entire range of issues in this docket, we will not address each of those issues below.² Rather, we will focus on some general consumer themes that involve pricing, competition, carrier-to-carrier performance measures and penalties, compliance with state law, and operation support system issues (OSS).

¹ See also Summary of Staff's Proposed Remedial Actions for Ameritech Illinois As Contained in Staff's Direct Testimonies, ICC Staff Ex. 1.0, Schedule 1.02. As noted by Staff: "Schedule 1.02 summarizes the minimum remedial actions Ameritech Illinois must take to enable the Commission to render a positive evaluation of Ameritech Illinois' Section 271 application." ICC Staff Ex. 1.0 (Hoagg) at 12.

² The focus here on the consumer-oriented issues raised by Staff is not intended to suggest that other issues aren't significant, nor should it be considered a waiver by the State's Attorney's Office of any issues not specifically discussed in this brief.

Network Interface Devices (NIDs) (Checklist Item 2)³

One of the issues raised by Staff relates to Ameritech Illinois' failure to address issues associated with its Network Interface Devices. Staff points to Ameritech Illinois' violation of prior ICC orders with respect to NIDs (86-0278 and 94-031) as evidence of this failure. ICC Staff Initial Brief at 125. Ameritech Illinois argues in its brief that it allows non-discriminatory access to NIDs, which may be true. However, Ameritech Illinois needs to comply with Commission orders to install NIDs and report annually on its efforts. As noted in Staff's brief, this lack of compliance will have an adverse impact on opening the market to competition, because, if left unremedied, it will inhibit a CLEC's ability to access NIDs in a manner consistent with the FCC's requirements. ICC Staff Initial Brief at 126.

Operation Support Systems (OSS) (Checklist Item 2)

The OSS area is one of the keys to competition and has a direct effect on consumers. OSS can affect a variety of key consumer related areas including installation, billing and repair. One of the OSS issues in this docket relates to line loss notification (LLN). The notice lets a carrier know that it has lost a customer. Post-Hearing Brief (Phase I) of Ameritech Illinois at 64. Ameritech Illinois believes that it has resolved the issues of line loss notification. Post-Hearing Brief (Phase I) of Ameritech Illinois at 69. Notwithstanding Ameritech Illinois' assertions, this Commission entered an order less than four months ago in Docket 02-0160 finding that Ameritech Illinois' line loss notification process was discriminatory.

Given the significance of this problem from both a consumer and CLEC viewpoint, the Commission should take steps to ensure that this issue has indeed been resolved appropriately and that Ameritech's OSS is functioning properly. As noted by Staff, "The LLN problem harms

³ The citations used in the header are meant as guides and not intended to be the sole support any argument as there may be overlap in the applicable sections of the telecommunications act.

CLEC reputations because AI does not send accurate and timely loss notifications to its wholesale customers.” ICC Staff Initial Brief at 130.

Phase two of the ICC proceeding will focus on OSS issues. Currently, KPMG Consulting is conducting a third party test of Ameritech’s OSS. KPMG has identified a variety of issues that it has drawn to Ameritech’s attention with respect to its OSS. While many of the issues have been resolved, there are still pending issues. Given the real impact deficiencies in this area could have on consumers, any reliable, objective evidence adduced through this process should be carefully weighed and considered by the Commission.

Pricing Issues (Checklist Item 2, Public Interest)

For there to be meaningful competition in Illinois, one needs to know what products are available and at what prices. In this docket, a variety of pricing issues have been raised, from Unbundled Network Element (UNE) prices to reciprocal compensation.

For example, Ameritech Illinois’ prices for the various pieces exceed the price of the whole. As noted by Staff, there are instances where the sub-loop portions end up costing more than the loop. ICC Staff Initial Brief at 149.

Additionally, Ameritech Illinois has not made an election at the FCC as to whether it will be adopting a particular pricing approach. Pricing issues introduce uncertainty in the local market in Illinois inhibiting open competition. Ameritech Illinois contends that Staff’s attempt to impose limits on future rate changes is not relevant to check list compliance. Post-Hearing Brief (Phase I) of Ameritech Illinois at 45. However, given the real impact this issue can have on competition, we believe the Commission is well within its rights pursuant to the public interest standard to consider this issue.

Staff has suggested a five-year rate cap on UNEs. ICC Staff Initial Brief at 244-248. Ameritech Illinois objects vigorously to this proposal. However this issue is resolved, to create a truly level competitive playing field requires compliance with approved pricing principles and some reasonable certainty regarding what elements are available at what price. If Ameritech Illinois has real problems with the suggested price cap, they should be required to offer a meaningful alternative.

Reciprocal Compensation (Checklist Item 1, 13)

As acknowledged by Ameritech Illinois, the 1996 Act requires “reciprocal compensation” for certain traffic. Post-Hearing Brief (Phase I) of Ameritech Illinois at 175. Further, Ameritech Illinois contends that “There is no dispute as to the facts that demonstrate checklist compliance:...” Id. at 175. However, Staff raised several issues with respect to reciprocal compensation that have not been fully addressed by Ameritech Illinois.

As noted by Staff, “Ameritech does not permit “opt-in” to terms and conditions of interconnection agreements related to reciprocal compensation as required by 251(i) of the 1996 Act, and does not offer nondiscriminatory access to reciprocal compensation rates as required by Section 251(c)(2) of the 1996 Act.” ICC Staff Brief at 50. Ameritech Illinois should, consistent with Staff’s recommendation, allow carriers to opt-into entire interconnection agreements. ICC Staff Brief at 51.

Another issue is Ameritech Illinois’ lack of an election with respect to either the FCC’s reciprocal compensation caps or, in the alternative, its failure to affirmatively forgo an election. ICC Staff’s Initial Brief at 55. As noted by Staff in their brief, this increases uncertainty for competitors of Ameritech Illinois. “This anticompetitive behavior violates Ameritech’s Section 251(c)(2) obligation to provide interconnection rates, terms, and conditions that are just,

reasonable, and nondiscriminatory and its Section 251(c)(2) obligation to negotiate in good faith.” ICC Staff Initial Brief at 55.

Additionally, Staff contends that, “The manner in which Ameritech has implemented the FCC’s *ISP-Bound Traffic Order* constitutes action by the company that violates the letter of Section 271 of the Act, as well as the spirit of both Section 271 and the competitive provisions of the 1996 Act in general.” ICC Staff Initial Brief at 199. As pointed out in prior briefs, Ameritech Illinois’ performance in this area merits review and consideration by the Commission as a part of its overall analysis of the pending 271 application. See ICC Staff Initial Brief at 209.

III. State Law Compliance Issues (Public Interest, Also Applicable Checklist Items)

Ameritech Illinois contends that while it takes state law seriously, federal law governs a 271 proceeding and state law compliance issues should not be considered in this docket. Post-Hearing Brief (Phase I) of Ameritech Illinois at 5. We disagree.

To the extent State law or ICC orders are consistent with a FCC 271 requirement, Ameritech Illinois must be in compliance with those laws or orders to meet the 271 requirements. As pointed out by Staff in their brief: “To the extent that Commission Orders and state law requirements effectively mirror federal requirements, it is self evident that compliance with such laws, orders and regulations must be demonstrated for Section 271 compliance.” ICC Staff Initial Brief at 16.

As noted in our initial brief, Ameritech Illinois needs to comply with ICC orders and State laws that are related to the various Section 271 provisions. See Cook County State’s Attorney’s Office’s Initial Brief at 6-8,10.

IV. Public Interest Matters

Ameritech Illinois contends in its Initial Brief that "...Congress did not even authorize this Commission to conduct a public interest inquiry or advise the FCC on that issue." Post-Hearing (Phase I) Brief of Ameritech Illinois at 185. However, while the FCC seeks consultation with the State Commission with respect to the checklist, the ICC's Order has opened this docket to considering the "public interest" provision as well.⁴ Sound public policy certainly allows and encourages such consideration, and Ameritech Illinois can point to no authority that would prevent a State Commission from providing relevant evidence to the FCC as part of its "public interest" consultation, separate and apart from what Federal law, interpreted in its narrowest terms, might require.

In sum, the record in this docket demonstrates that corrective action must be taken by Ameritech Illinois with respect to several issues before the Commission can appropriately conclude that the "public interest" will be fully protected if Section 271 approval is granted. It is our hope that Ameritech Illinois will meet with Staff and take the corrective action necessary to provide maximum benefits so as to satisfy this public interest.

V. Conclusion

As stated in our initial brief, Cook County supports the concept of Ameritech Illinois obtaining Section 271 approval at the earliest possible time. However, this should not come at the expense of telecommunication companies and Illinois consumers. The above issues are just

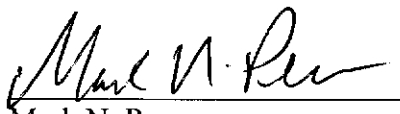
⁴ Illinois Commerce Commission, On Its Own Motion, Investigation concerning Illinois Bell Telephone Company's compliance with Section 271 of the Telecommunications Act of 1996, ICC Docket No. 01-0662, Order at 3.

some of the areas that need to be addressed before the Commission should provide a favorable consultation to the FCC.

The Commission should issue a phase one order listing the provisions in which compliance has not been shown. Further, the Commission should provide Ameritech Illinois with an opportunity to remedy the various shortcomings. Additionally, the Commission should analyze whether the market is irrevocably open to competition in Illinois. Finally, Ameritech Illinois should be required to meet relevant Illinois state law requirements before the Commission grants its approval under the 271 framework.

Respectfully Submitted,

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ICC Docket No. 01-0662

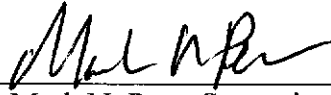
NOTICE OF FILING

TO: See Attached Service List.

PLEASE TAKE NOTICE that on this date, August 28, 2002, we have filed by sending by Federal Express today to the Chief Clerk of the Illinois Commerce Commission the enclosed Reply Brief of the Cook County State's Attorney's Office in the above-captioned docket.


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CERTIFICATE OF SERVICE

I, **MARK N. PERA**, hereby certify that a copy of the enclosed Reply Brief of the Cook County State's Attorney's was served on all parties on the attached list on the 28th day of August 2002 by hand delivery, Federal Express, electronic mail, or U. S. first class mail prepaid.


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